divorce decree given at the matrimonial domicile. The plaintiff demurred to the plea. *Held*, that the demurrer should be overruled. *Thompson* v. *Thompson*, 226 U. S. 551, 33 Sup. Ct. 129.

The court reaffirms the doctrine established by its former decisions, that a divorce decree is entitled to full faith and credit only when it is given by the state of the matrimonial domicile, or when personal service is made upon the party not domiciled within the jurisdiction making the decree. *Atherton* v. *Atherton*, 181 U. S. 155, 21 Sup. Ct. 544; *Cheever* v. *Wilson*, 9 Wall. (U. S.) 108. See *Haddock* v. *Haddock*, 201 U. S. 562, 567, 26 Sup. Ct. 525, 526. But the decision in the principal case would be reached upon any of the theories of divorce jurisdiction adhered to in other courts. *Cf. Larquie* v. *Larquie*, 40 La. Ann. 457, 4 So. 335; *Burtis* v. *Burtis*, 161 Mass. 508, 37 N. E. 740; *Le Mesurier* v. *Le Mesurier*, [1895] A. C. 517. See 19 HARV. L. REV. 586; 21 *id.* 296.

CONFLICT OF LAWS — JURISDICTION FOR DIVORCE — SEPARATE DOMICILE OF WIFE. — A Greek, domiciled in his native country, married an Englishwoman at her domicile in England. No matrimonial domicile was ever established. A Greek court annulled the marriage because the ceremony was not performed in the presence of a Greek priest, as required by the laws of Greece. The husband married again, and the wife, having returned to live in England, sued for a divorce. *Held*, that the divorce will be granted. *Stathatos* v. *Stathdtos*, 57 Sol. J. 114, 107 L. T. R. 592, 29 T. L. R. 54 (Eng., P. D., 1912). See NOTES, p. 447.

CONFLICT OF LAWS — RECOGNITION OF FOREIGN JUDGMENTS — REVERSAL OF JUDGMENT AS DEFENSE TO JUDGMENT BASED UPON REVERSED JUDGMENT. — In an action in New York on a Wisconsin judgment, the defendant set up a California judgment by way of counterclaim. The California judgment was based upon a reversed Wisconsin judgment. The plaintiff had obtained an order vacating the California judgment, but the validity of this order was questionable. *Held*, that the reversal of the Wisconsin judgment is a defense to the California judgment based upon it. *Ellis* v. *Delafield*, 153 N. Y. App. Div. 26. See NOTES, p. 437.

CONSTITUTIONAL LAW — PERSONAL RIGHTS: RELIGIOUS LIBERTY — CONSTITUTIONALITY OF FEE TO SUPPORT CHRISTIAN ASSOCIATION IN STATE COLLEGE. — The board of regents of a state college in Oklahoma required, as a condition precedent to admission, the payment of a fee, part of which was devoted to the maintenance of a Young Men's Christian Association. The state constitution provided that "No public money . . . shall ever be appropriated, . . . directly or indirectly, for the use, benefit or support of any sect, church, denomination, or system of religion. . . ." *Held*, that the requirement of the fee is unconstitutional. *Connell* v. *Gray*, 127 Pac. 417 (Okla.).

The Young Men's Christian Associations, having for their avowed purpose the spread of Christianity and a membership test based on belief in orthodox Christian principles, seem well within the constitutional provision prohibiting public support to any "system of religion." Requiring a fee to support such organizations as a condition precedent to matriculation seems a clearer constitutional violation than Bible reading in public schools, which under similar provisions has been held unlawful. *State ex rel. Weiss* v. *District Board*, 76 Wis. 177, 44 N. W. 967; *People ex rel. Ring* v. *Board of Education*, 245 Ill. 334, 92 N. E. 251. Other cases apparently opposed to these declare exercises based on the Bible lawful when unaccompanied by comment, and non-compulsory, but these were decided under constitutions whose provisions were much less comprehensive than the one in the principal case. *Moore* v. *Monroe*, 64 Ia. 367, 20 N. W. 475; *Pfeiffer* v. *Board of Education*, 118 Mich. 560, 77 N. W. 250.